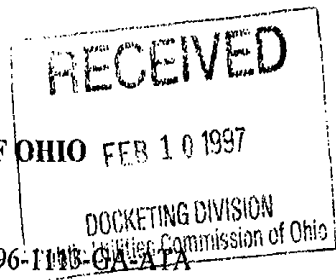


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BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO



In the Matter of the Application of)
COLUMBIA GAS OF OHIO, INC. to)
Establish the Columbia Customer)
Choice Program)

Case No. 96-1113-GA-ATA

**MOTION TO INTERVENE
OF
THE COLUMBIA GAS SYSTEM, INC. ET AL.**

The Columbia Gas System, Inc. and its subsidiaries, excluding Columbia Gas of Ohio, Inc. and Columbia Energy Services Corporation, ("Columbia System") file this Motion to Intervene with the Public Utilities Commission of Ohio ("Commission") pursuant to Ohio Revised Code ("R.C.") Section 4903.10, for the reasons given in the Memorandum in Support below.

MEMORANDUM IN SUPPORT

Columbia System are affiliates of Columbia Gas of Ohio, Inc. ("COH"), the applicant in this proceeding, which filed an amended tariff application on January 3, 1997 ("COH Application") with the Public Utilities Commission of Ohio ("Commission"). There was nothing in the COH Application that alerted Columbia System that its interests might be affected. The Commission did not rule that COH's "first filing" was unjust or unreasonable and set the matter for a hearing. The COH Application did not provide for Commission audits of non-utility affiliates of COH. However, the Opinion and Order issued January 9, 1997 modified the COH Application and provided for audits of Columbia System.

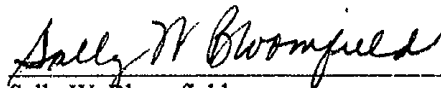
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Columbia System had no notice that the Commission would modify a first filing without a hearing as required by R.C. Section 4909.18. Thus Columbia System's failure to move to intervene was thus due to just and reasonable cause.

The interest of Columbia System was not considered in the ruling; indeed, as stated in the accompanying Application for Rehearing/Clarification, the Commission's order has a profound adverse effect upon Columbia System.

For these reasons Columbia System urges the Commission to permit its intervention and to accept its Application for Rehearing/Clarification.

Respectfully submitted on behalf of
THE COLUMBIA GAS SYSTEM, INC. et. al.



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Motion to Intervene by The Columbia Gas System, Inc. et. al. has been served upon the following parties listed below by hand delivery, fax or regular U.S. mail, postage prepaid, this 10th day of February, 1996.

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